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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION
AT LAW AND IN ADMIRALTY

**DENNIS C. PAYNE and SUSAN
PAYNE,**

Plaintiffs,

vs.

ABB, INC. (*sued individually and as
successor-in-interest to BAILEY
METER CO.*), et al.

Defendants.

Case No. 2:20-cv-01198-MCE-AC

**NOTICE OF TAKING VIDEOTAPED
DEPOSITION OF PLAINTIFF
DENNIS C. PAYNE**

Date: November 10, 2020

Time: 10:00 a.m.

Location: **Via Video-Conferencing only.**
Contact: (214) 347-4781,
For assistance

Action Filed: September 4, 2020

Trial Date: None Set

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that the discovery deposition of the following-described
3 person will be taken pursuant to the Federal Rules of Civil Procedure and other applicable
4 rules and statutes; that said deposition will be taken before a Notary Public and certified
5 Shorthand Reporter, or any other office authorized by law to take depositions in like
6 cases.

7
8 **WITNESS:** Dennis C. Payne
9 **DATE:** November 10, 2020
10 **TIME:** 10:00 a.m. (local time)
11 **PLACE:** Via Video-Conferencing only.
12 **COURT REPORTER:** Asbestos Reporters, a GPS Partnership
13 Email: mcared@asbestosreporters.com
14 Tel: (214) 347-4781

15 This oral examination will be subject to continuance or adjournment from day to
16 day (excluding weekends and holidays) or place to place until completed.
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19 DATED: September 24, 2020

FROST LAW FIRM, PC

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21 By: /s/ Andrew Seitz

22 ANDREW SEITZ

23 Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I declare that I am over the age of 18, not a party to the above-entitled action, and am an employee of Frost Law Firm, PC whose business address is 273 West 7th Street, San Pedro, CA 90731.

On September 24, 2020, I served the following document in the following manner:

NOTICE OF TAKING VIDEOTAPED DEPOSITION OF PLAINTIFF DENNIS C. PAYNE

☒ (CM/ECF System) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF systems, to the parties and/or counsel who are registered CM/ECF Users set forth in the service list that is located on the PACER website.

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on September 24, 2020, San Pedro, California.

/s/ Kimberly Manalansan
KIMBERLY MANALANSAN